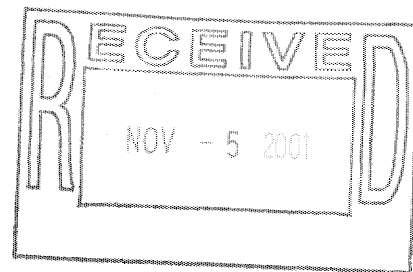




Innovative Nutrition Solutions

4390 '01 NOV 27 P1:36



October 24, 2001

Food and Drug Administration
Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
200 C Street, SW
Washington, DC 20204

Dear Sirs:

Notice is hereby given that Rexall Sundown, Inc. ("Sundown") located at 6111 Broken Sound Parkway, N.W., Boca Raton, Florida 33487 has marketed a dietary supplement under the Sundown brand name bearing the following statement(s) on the label and/or in the labeling:

Alpha Lipoic Acid 50mg: [For] healthy cell function and energy production. [It] promotes healthy cell function and enhances energy production. It provides antioxidant protection from free radicals that may cause premature aging. It also helps the body metabolize sugar, primarily in muscle cells, where it is used for energy. [It] is unique in that it is both fat and water soluble, so it can provide antioxidant protection for the entire cell.

The undersigned certifies that the information contained in this notice is complete and accurate and that Sundown has substantiation that the statement is truthful and not misleading. Pursuant to § 101.93 (a)(1), two copies of this notification are enclosed.

Sincerely,

A handwritten signature in cursive script, appearing to read "Deborah Shur Trinker".

Deborah Shur Trinker, Esq.
Senior Vice President
Regulatory Affairs

Enclosure

975-0162 LET 8777

6111 BROKEN SOUND PKWY. NW • BOCA RATON, FLORIDA 33487
561-241-9400 • FAX 561-995-5188